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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS RESPONSIVE
TRIAL BRIEF (DKT. 2271)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Its Responsive Trial Brief (Dkt. 2271).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Responsive Trial Brief	Green Highlights
Exhibit D to Waymo's Responsive Trial Brief	Photographs on page 122, & final line of page 144

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14 3. The green highlights in Waymo's Responsive Trial Brief contain a reference to a
15 third party vendor under an NDA with Uber. This information is not publicly known, and its
16 confidentiality is strictly maintained. Defendants request this information be sealed to protect this
17 confidential business relationship from disclosure and possible interference from competitors.

18 4. The two photographs on page 122 and the final line of page 144 of Exhibit D
19 contain highly confidential information regarding technical details and cost considerations of
20 Defendants' LiDAR sensors. This information is not publicly known, and its confidentiality is
21 strictly maintained. I understand that disclosure of this information could allow competitors and
22 counterparties to acquire technical and financial insight into Defendants' LiDAR development,
23 such that Defendants' competitive standing could be significantly harmed.

24 5. Defendants' request to seal is narrowly tailored to the portions of Waymo's
25 Responsive Trial Brief and supporting exhibits that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 30th day of November, 2017 at San Francisco, California.

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4 /s/ Thomas J. Pardini
Thomas J. Pardini
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